

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 23-md-03084-CRB

This Document Relates to:

ALL CASES

**DECLARATION OF ROOPAL P. LUHANA
IN SUPPORT OF ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIAL
SHOULD BE FILED UNDER SEAL**

I, Roopal P. Luhana, declare:

1. I am an attorney in the law firm of Chaffin Luhana LLP, appointed Co-Lead counsel for Plaintiffs in the above-captioned Multi-District Litigation. I am a member of the State Bar of New York and am admitted *pro hac vice* to practice before this Court. I make this declaration based on my own personal knowledge. If called upon to testify, I could and would testify competently to the truth of the matters stated herein

2. Because the materials at issue were previously designated confidential by Uber, Plaintiffs filed the following under seal:

Document	Description	Designating Party
Exhibit A to Reply In Support of Motion to Compel Custodial Discovery	Chart previously filed under seal by Uber	Uber
Exhibit B to Reply In Support of Motion to Compel Custodial Discovery	Chart previously filed under seal by Uber	Uber

1 I declare under penalty of perjury that the foregoing is true and correct.

2 Executed this 17th day of September, 2024 in Brooklyn, NY.

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4 /s/ Roopal P. Luhana
5 Roopal P. Luhana
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